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March 11, 2020

Via CM/ECF Filing

The Honorable Victor Marrero
Courtroom 15B
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

USDC SDNY
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Re: Loudon v. The Daily Beast Company LLC, et al., No. 19-cv-9414 (S.D.N.Y.)

Dear Judge Marrero:

We write jointly on behalf of the parties to request a brief, two-week extension of the Court's deadlines for the parties to submit letters on whether dismissal is warranted based on the Plaintiff's failure to adequately plead actual malice. *See* Dkt. 18.

As reported to your law clerk last week, the parties have made meaningful progress towards a non-monetary resolution of the above-referenced matter. We respectfully request a two-week extension to allow us to bring those discussions to a conclusion without expending additional resources on further correspondence addressing the merits. Specifically, the parties jointly request that the deadline for Defendants to submit a letter to the Court on the issue of actual malice be extended from March 17, 2020, to March 31, 2020, and that Plaintiff's deadline to respond to that letter be extended from March 27, 2020, to April 10, 2020. We believe this additional time would allow the parties to conclude their discussions and either inform the Court of a resolution or prepare letters addressing actual malice as directed by the Court.

The parties jointly request this extension; they have not made any prior requests for an extension of this deadline; and the requested extension would not affect any scheduled dates, case management plan, or scheduling order.

Respectfully submitted,

/s/

Seth D. Berlin
Jacquelyn N. Schell

Counsel for Defendants

<u>Request GRANTED. The time for the parties to submit letter-briefs addressing the malice issue herein is extended to the dates set forth above.</u>	
SO ORDERED.	
<u>3-11-20</u>	<u>[Signature]</u>
DATE	VICTOR MARRERO, U.S.D.J.